

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: Soon O Choi

) Case no. 16-14014
)
) Chapter 13
)
Debtor) Judge: Janet S. Baer
)

NOTICE OF MOTION AND CERTIFICATE OF SERVICE

Soon O Choi
1204 Richmond Ave
Westmont, IL 60559

Sulaiman Law Group
2500 S Highland Ave #200
Lombard, IL 60148

Please take notice that on Friday, March 1, 2019 at 9:15 am, a representative of this office shall appear before the Honorable Judge Janet S. Baer at the Kane County Courthouse, 100 S 3rd Street, Courtroom 240, Geneva, IL 60134 and present the motion set forth below. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on Wednesday, January 30, 2019.

/s/ Louise Karmia

For: Glenn Stearns, Trustee

MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to Section 1307(c)(6), and in support thereof, states the following:

1. The debtor filed a petition under the Bankruptcy Code on April 25, 2016.
2. The debtor plan was confirmed on July 22, 2016.
3. The debtor current plan payment is \$1,550.00.
4. The last payment received from the debtor was July 31, 2018.
5. The accrued default under the plan is \$1,685.69, which is the audited balance remaining on the plan as of the preparation of this motion.

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to the term of a confirmed plan, pursuant to Section 1307(c)(6).

Respectfully Submitted;

Glenn Stearns, Chapter 13 Trustee
801 Warrenville Road, Suite 650
Lisle, IL 60532-4350
Ph: (630) 981-3888

/s/ Carolyn A. Suzzi

For: Glenn Stearns, Trustee